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4 Attorney for Paul Engstrom

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6 UNITED STATES DISTRICT COURT
7 DISTRICT OF NEVADA

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9 UNITED STATES OF AMERICA,
10 Plaintiff,
11 vs.
12 PAUL ENGSTROM,
13 Defendant.

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CASE NO. 2:15-cr-00255-JAD-PAL
MOTION TO EXTEND MOTIONS' DEADLINE

15 Defendant, Paul Engstrom, by his attorney of record, Kathleen Bliss, respectfully requests
16 that the Court enter an order allowing him a one-week extension of the motions' deadline herein.
17 A proposed order is submitted herewith.

18 In support of his motion, defendant shows the court as follows:

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20 1. On this date, counsel for defendant requested a one-week extension from counsel
21 for the United States. Counsel had conferred previously about the existence of
22 additional discovery, and counsel for the government stated that an extension for
23 filing motions would not be opposed. Defendant's counsel still believes that the
24 government does not oppose a one-week extension.

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26 2. On this date, December 15, 2015, the deadline for motions, defendant's counsel
27 requested a one-week extension as no additional discovery had been provided to

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1 date. The requested discovery concerns events on which the warrantless search of
2 defendant's vehicle occurred, so the discovery impacts any motions filed by
3 defendant. The government advised defendant's counsel that recently the requested
4 discovery had been obtained by the government. Defendant's counsel should
5 obtain the discovery, consisting of several discs, on December 16, 2015, but cannot
6 review it until later in the week.
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8 3. Defendant's counsel thus needs additional time to review the additional discovery,
9 which may affect the extent and scope of any motions filed. Defendant would be
10 seriously prejudiced if not allowed to file motions, and he bears no fault in this
11 delay. As such, this request for a one-week extension is reasonable and not for the
12 purpose of any delay.
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14 4. Defendant's counsel provided the government with a proposed stipulation on this
15 date but had not heard back from the government by close of business.
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17 5. Counsel for the defendant further shows the court that counsel was retained on
18 November 4, 2015 and a stipulation to extend motion and trial dates was granted by
19 the Court on November 5, 2015. The Court set the motions deadline for December
20 15, 2015.
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6. Counsel for the defendant does not anticipate that a one-week extension will affect the trial date in this case, which is scheduled on February 9, 2016.

7. As such the schedule would be as follows:

Motions deadline: December 22, 2015; Responses: January 5, 2016; Replies: January 12, 2016.

DATED this 15th day of December, 2015

/S/ *Kathleen Bliss*

Kathleen Bliss, Esq.
Kathleen Bliss Law Group, PLLC
The Federal Defenders Law Group, LLC
Nevada Bar #7606

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1 Responses shall be filed on or by January 5, 2016

2 Replies shall be filed on or by January 12, 2016.

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4 DATED this 16th day of December, 2015.

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8 UNITED STATES MAGISTRATE JUDGE

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CERTIFICATE OF SERVICE

In accordance with Rule 49(c) of the Federal Rules of Criminal Procedure, I certify that I am an employee of THE FEDERAL DEFENDERS LAW GROUP, LLC, and that on this 15th day of December, 2015, I did cause a true and correct copy of:

MOTION TO EXTEND MOTIONS' DEADLINE

To be served electronically to the parties of record through electronic mail:

By: s/ Krystle Platero

An employee of
THE FEDERAL DEFENDERS LAW GROUP, PLLC